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August 12, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th H Street, SW, Portals
Washington, DC 20554

Re: Joint Application by Verizon for Authorization To Provide In-Region, InterLATA Services in States of Delaware and New Hampshire, Docket No. 02-157 - REDACTED

Dear Ms. Dortch:

I am writing to correct certain information provided in Verizon's joint Delaware and New Hampshire 271 filing.

In paragraphs 118, 119, 121, and 122 of the Declaration of Paul A. Lacouture and Virginia P. Ruesterholz regarding Delaware (FCC filed June 27, 2002), Verizon provided three month weighted averages (Feb 02 – Apr 02) for two UNE Special Services provisioning metrics, PR-4-01-3200 and PR-6-01-3200, for both Delaware and Pennsylvania. We have discovered that the Aggregate Carrier-to-Carrier ("C2C") Performance Reports for April, May, and June of 2002 contained errors affecting these two metrics for both Delaware and Pennsylvania. Specifically, in the April, May, and June Aggregate C2C reports, the UNE Special Services provisioning category incorrectly included certain platform orders. Accordingly, Attachment 1 to this letter provides corrected observations and performance results for CLECs for the month of April for metrics affected by this error. CLEC-Specific C2C reports for the month of April, for CLECs that have activity for these metrics, have also been corrected. (For other CLECs, these metrics should have been reported as NA.) Finally, corrected pages of the Lacouture/Ruesterholz DE Declaration and the Application are provided.

On July 2, 2002 and August 2, 2002, Verizon provided the Delaware and Pennsylvania Carrier-to-Carrier reports for May and June, respectively, to staff. See Letter from Richard Ellis to Marlene Dortch, dated July 2, 2002; Letter from Richard Ellis to Marlene Dortch, dated August 2, 2002. These reports, and the CLEC-Specific reports for these months also contained the error described above. Corrections to the May and June Aggregate and CLEC-Specific reports are

REDACTED – FOR PUBLIC INSPECTION

Ms. Dortch
August 12, 2002
Page 2

contained in Attachment 2. In addition, the May 2002 Aggregate C2C report incorrectly contained NA ("No Activity") designations in the performance columns for certain metrics that had actual observations for both Delaware and Pennsylvania. Attachment 2 provides the performance results for the metrics affected by this error. Finally, the CLEC line counts (observations) for two UNE Special Services maintenance metrics, PR-2-01-3200 and PR-2-05-3200, for Delaware and Pennsylvania for the months of May and June have been corrected in Attachment 2.

The attachments contain proprietary information and has been redacted. A confidential version is also being filed. Please let me know if you have any questions.

Sincerely,



Attachments

cc: H. Thaggert
V. Schlesinger
G. Remondino
T. Wilson

ATTACHMENT 1

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ATTACHMENT 2

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ATTACHMENT 3

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acceptable given that high-capacity loops “represent a small percentage of all loops ordered by competitors”). In Delaware, during that same period, Verizon met more than 97 percent of its installation appointments for CLEC high-capacity loop orders compared to just over 99 percent for the retail comparison group. See Lacouture/Ruesterholz DE Decl. ¶ 118. In Massachusetts, Verizon met more than 94 percent of its installation appointments for CLEC high-capacity loops from February through April, which is better than for the retail comparison group. See Lacouture/Ruesterholz NH Decl. ¶ 119. In Pennsylvania, Verizon met approximately 96 percent of its installation appointments for CLEC high-capacity loops during that same period, compared to about 98 percent for the retail comparison group. See Lacouture/Ruesterholz DE Decl. ¶ 119.

Verizon also provides high-capacity loops with a high degree of quality. The installation quality measurements for high-capacity loops report Verizon’s performance on these loops together with its performance for high-capacity interoffice facilities and loop and transport combinations. See Lacouture/Ruesterholz NH Decl. ¶ 121; Lacouture/Ruesterholz DE Decl. ¶ 121. Between February and April, CLECs reported only 13 installation troubles on high-capacity loops, interoffice transport facilities, and loop and transport combinations in New Hampshire, and in Delaware the installation trouble rate was 3.85 percent for CLECs compared to 4.33 percent for the retail comparison group. See Lacouture/Ruesterholz NH Decl. ¶ 121; Lacouture/Ruesterholz DE Decl. ¶ 121.

Verizon’s performance in maintaining and repairing high-capacity loops also is strong. From February through April, the trouble report rate relating to high-capacity loops, interoffice facilities, and loop and transport combinations was about 2 percent or less for CLECs in New Hampshire, Delaware, Massachusetts, and Pennsylvania. See Lacouture/Ruesterholz NH Decl. ¶¶ 123-124; Lacouture/Ruesterholz DE Decl. ¶¶ 124-125. And in each of those states the trouble

c. High Capacity Loops

115. Verizon offers CLECs unbundled access to high capacity (DS-1 and DS-3) loops in Delaware in the same manner as in Pennsylvania. High capacity loops are available in Delaware under interconnection agreements. *See* Attachment 1.

116. As of March 2002, Verizon has in service about 650 high capacity DS-1 loops, and no high capacity DS-3 loop in Delaware. High capacity loops in Delaware represent only about three percent of all unbundled loops provisioned to competitors.

117. Verizon's provisioning and maintenance processes for high capacity loops received ISO 9000 certification in May 2002. As previously explained, this certification is part of Verizon's long-term commitment to providing high quality services to its wholesale customers.

118. During February, March and April 2002, Verizon missed only one installation appointment in Delaware for high capacity loops (PR-4-01-3200). This means that Verizon completed on time 97.37 percent of CLEC high capacity loop orders, compared to 99.47 percent for the retail comparison group. *See* Carrier-to-Carrier Trend Reports (App. N-DE, Tab 1 at 233).

119. Verizon's on time performance for high capacity loops in Pennsylvania is also strong. During February, March and April 2002, Verizon missed only 4.40 percent of high capacity loop orders for CLECs in Pennsylvania, as compared to 2.16 percent for the retail comparison group (PR-4-01-3200). *See* Carrier-to-Carrier Trend Reports (App. N-DE, Tab 2 at 254).

120. As explained in the declaration of Ms. Guerard, Ms. Canny, Ms. Abesamis and Ms. DeVito, the average completed interval measures will no longer be reported in

Delaware once Verizon begins to report its performance in Delaware under the New York measurements. *See* Guerard/Canny/Abesamis/DeVito Decl. ¶ 66 (App. A, Tab E). During February, March and April 2002, there were only 12 orders reported under this measure, which are too few to provide meaningful performance results (PR-2-07-3211). *See* Carrier-to-Carrier Trend Reports (App. N-DE, Tab 1 at 232).

121. Verizon is also installing high capacity loops with a high level of quality. Verizon's installation quality in Delaware is not reported separately for DS-1 loops. During February, March and April 2002, Verizon's installation trouble report rate for high capacity loops, loop/transport combinations and interoffice facilities was 3.85 percent in Delaware, compared to 4.33 percent for the retail comparison group (PR-6-01-3200). *See* Carrier-to-Carrier Trend Reports (App. N-DE, Tab 1 at 237).

122. Verizon's installation quality also continues to be strong in Pennsylvania. During February, March and April 2002, Verizon's installation trouble report rate for high capacity loops, loop/transport combinations and interoffice facilities was 1.99 percent in Pennsylvania, compared to 3.02 percent for the retail comparison group (PR-6-01-3200). *See* Carrier-to-Carrier Trend Reports (App. N-DE, Tab 2 at 259).

123. Verizon's performance is especially strong considering that the retail comparison group for PR-6-01-3200 is not appropriate. On the one hand, over 90 percent of the orders in the retail comparison group are for DS-0 services and feature changes, which are very simple to perform. On the other hand, 100 percent of the wholesale performance group is comprised of DS-1 and DS-3 loops, which are significantly more difficult to provision. It is therefore more likely for the wholesale group to experience installation troubles than the retail comparison group.